

Exhibit E

Re: Barbounis v. MEF--Notice of Deposition

Seth Carson <seth@dereksmithlaw.com>

Tue 10/20/2020 6:52 PM

To: Benson, Leigh Ann <LBenson@cozen.com>

Cc: Sidney Gold <sgold@discrimlaw.net>; Bill Rieser <brieser@discrimlaw.net>; Walton, David <DWalton@cozen.com>; Cavalier, Jonathan <JCavalier@cozen.com>; Rhym, Kia B. <KRhym@cozen.com>

Please be advised that I am not going to produce Lisa unless we have all the deps on the schedule.

I need dates certain for:

1. Mathew Bennet
2. Mark Fink
3. Greg Roman (It does not matter if he thinks he is unavailable. He is the reason we are doing this. His deposition is mandatory for 7 hours)
4. Daniel Pipes - 7 hours.
5. Steve Levey
6. Laurence Hollin

Please understand that we need all the deps scheduled. If we get an extension, I will work with you on dates - but I am going to postpone depositions if your client does not demonstrate a willingness to attend and testify.

This means Patricia McNulty and Lisa's mom too.

I need dates for everyone - but Greg Roman and Daniel Pipes are the two most important people.

Again, if I do not have dates for the above 6 people - than all other deps will be postponed.

I prefer not to postpone any of them but we held a call last Friday to discuss dates and I have not been provided a single date yet. This is after 2 conference calls including today's.

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From: Benson, Leigh Ann <LBenson@cozen.com>
Sent: Friday, October 16, 2020 5:47 PM
To: Seth Carson <seth@dereksmithlaw.com>
Cc: Sidney Gold <sgold@discrimlaw.net>; Bill Rieser <brieser@discrimlaw.net>; Walton, David <DWalton@cozen.com>; Cavalier, Jonathan <JCavalier@cozen.com>; Rhym, Kia B. <KRhym@cozen.com>
Subject: Barbounis v. MEF--Notice of Deposition

Seth, please see the attached notice of deposition for Ms. Barbounis.



Leigh Ann Benson

Associate | Cozen O'Connor

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